

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

JONATHAN HERNANDEZ,

Plaintiff,

v.

JAMES BRADFORD THOMAS, MARTEN
TRANSPORT, LTD,

Defendants.

2:22-CV-00066-LGW-BWC

VERDICT FORM

PART I – LIABILITY

- 1. Did Plaintiff prove by a preponderance of the evidence that there was negligence on the part of Defendant James Bradford Thomas which was a legal cause of injury to Plaintiff Jonathan Hernandez?**

_____ Yes

____ 8X ____ No

If your answer to Question 1 is Yes, proceed to Question 2. If your answer to Question 1 is No, stop here, and have the foreperson sign and date the verdict form.

- 2. Did Defendants prove by a preponderance of the evidence that there was negligence on the part of Plaintiff Jonathan Hernandez that was a legal cause of injury to himself?**

_____ Yes

_____ No

- 3. Did Defendants prove by a preponderance of the evidence all elements necessary to show that Plaintiff knowingly and voluntarily assumed the risk of his injuries?**

_____ Yes

_____ No

If your answer to Question 3 is Yes, stop here, and have the foreperson sign and date the verdict form. If your answer to Question 3 is No, proceed to Question 4.

- 4. Did Defendants prove by a preponderance of the evidence that Plaintiff had a duty to exercise ordinary care to avoid the consequences of the Defendant's negligence, and did Defendants prove that Plaintiff failed in that duty?**

_____ Yes

_____ No

If your answer to Question 4 is Yes, stop here, and have the foreperson sign and date the verdict form. If your answer to Question 4 is No, proceed to Question 5.

PART II – APPORTIONMENT OF FAULT

Answer the following question on apportionment of fault only if you answered “Yes” to both Question 1 and Question 2.

5. Apportion the percentage of fault among the entities whose negligence you found by a preponderance of the evidence to be a proximate cause of Plaintiff’s injuries. **Your allocation of fault must add up to 100%.**

Defendant James Bradford Thomas _____ %

Plaintiff Jonathan Hernandez: _____ %

If your answer to Question 5 apportions fifty percent or more negligence to Plaintiff Jonathan Hernandez, stop here, and have the foreperson sign and date the verdict form.

PART III – DAMAGES

Answer the following questions regarding damages only if you found in Question 1 that Defendant Thomas’s negligence was a proximate cause of Plaintiff’s injuries.

Please enter the amount of damages incurred by Plaintiff. In determining the amount of damages do not make any reduction because of the negligence, if any, of the Plaintiff:

6. Past Medical Expenses: \$ _____

7. Future Medical Expenses: \$ _____

8. Past Lost Earnings: \$ _____

9. Future Lost Earnings/Earning Capacity: \$ _____


10. Non-economic Damages (pain and suffering, mental anguish, loss of enjoyment of life): \$ _____

11. TOTAL DAMAGES \$ _____

The total damages in Question 11 should equal the sum of amounts you awarded in Questions 6-10.

Your deliberations are now complete. Please have the foreperson sign and date below.

So say we all,


Foreperson’s Signature

31 9-29-25

Date